

EXHIBIT F

Material Solutions. Uncompromising Integrity.



Final Report

Anderson Law Offices LLC
Mr. Benjamin H. Anderson

Date: 05/20/2014

Released by:
Dr. Howard Jordi
Founder
Jordi Labs LLC

Report Number: J8689

Anderson Law Offices LLC - Confidential



WEB: www.jordilabs.com

EMAIL: info@jordilabs.com

VI. Deposition of Daniel F. Burkley, MS

I have studied the deposition of Mr. Daniel F. Burkley, an Analytical Chemist employed by Ethicon/Johnson & Johnson and we feel qualified to express my opinion to a reasonable degree of scientific certainty on certain aspects of his deposition. Specifically, we would like to comment on the following topics:

a. GPC analysis of the 7 year dog study and comparison with Jordi GPC analysis

The Jordi GPC analysis of both control and explant samples tends to confirm "The 7 Year Dog Study" performed at Ethicon referred to as Exhibit T-282 in his deposition of May 22, 2013, in that little to no macro Mw degradation was noted. This might be due to the solubilization of the total sample when perhaps only the surface polymer (as shown by SEM images) was in fact degraded. This behavior might indicate that degradation is only a surface and not a bulk phenomenon. This would tend to be expected as macrophages attack the exposed surface of the polypropylene material.⁴¹ Therefore, even if no gross Mw degradation was observed in either study, it cannot be stated to a reasonable degree of scientific certainty that the polypropylene suture did not degrade. In other words, the dissolution of non-cracked polypropylene during the GPC analysis would render the cracked polypropylene portion insignificant in terms of relative quantities. Based on my review of the scientific literature, my review of Ethicon's internal documents, including the data from the 7 year dog study, my knowledge, training and experience as polymer scientists, and the review of the data discussed herein, it is my opinion to a reasonable degree of scientific certainty that the cracked surface of Ethicon's Prolene suture in Burkley's 7-year dog study was indeed due to degradation and oxidation and that the conclusion by Ethicon that "degradation in PROLENE is still increasing and PVDF, even though a few cracks were found, is still by far the most surface resistant in-house made suture in terms of cracking" should have caused Ethicon to do further explant degradation studies. This is especially true given that the mesh material made of Prolene was intended to be permanently implanted in a woman's pelvic tissue. Of note, Ethicon's SEM images of the dog suture showed similar degradation and cracks as my own images. [See image below]⁴²

⁴¹ S. A. M. Ali, S. -P. Zhong, P. J. Doherty and D. F. Williams, *Biomaterials* 14 (1993) 648-656.

⁴² ETH.MESH.09557798 – Seven Year Dog Study images

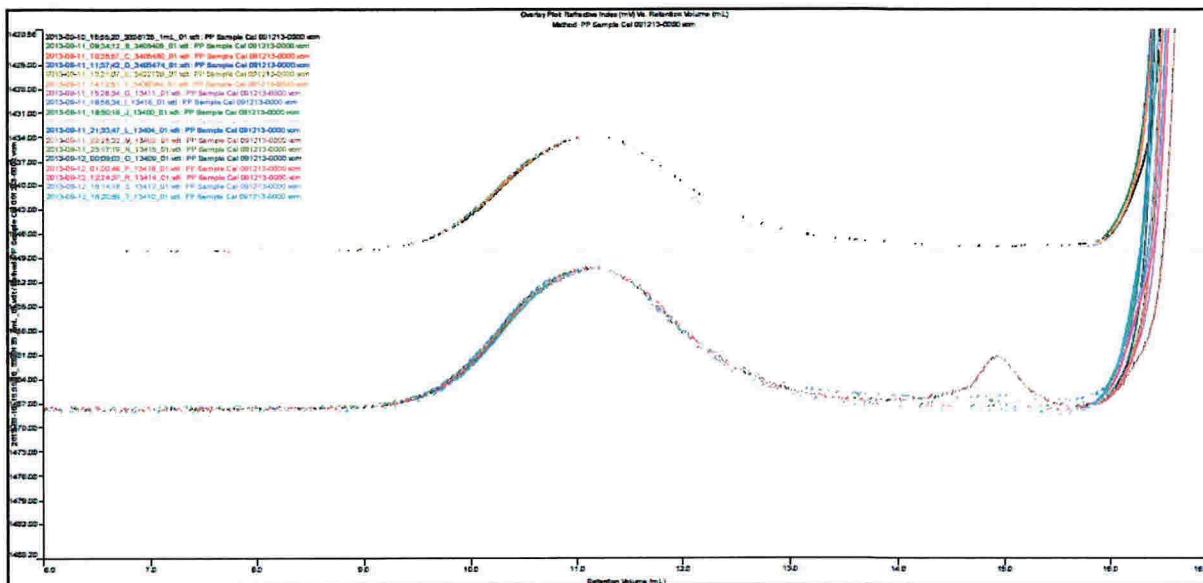


Figure 88: Normalized overlay of refractive index chromatogram for the explant (bottom) and control samples (top).

Scientific Opinion

The control and explant samples do not show a significant difference in molecular weight. It is evident from the SEM data that ~3um of the surface is cracked which is less than 2% of the fiber diameter. Thus it is expected that the GPC-HT will not show any large variation in the molecular weight. Because GPC-HT is a bulk technique (entire fiber is dissolved), changes in molecular weight may not be detectable given that the majority of the degradation is a surface phenomenon. Furthermore, the environmental stress cracking mechanism does not require a decrease in molecular weight. Therefore, based on my review of the scientific literature, my knowledge, training and experience as polymer scientists, and the examination of the data, it is my opinion, to a reasonable degree of scientific certainty, that given the previous results from SEM and DSC analyses (consistent with environmental stress cracking), and SEM-EDX and FTIR-microscopy analyses (consistent with oxidation), that the observed cracking in the explant samples is due to a combination of environmental stress cracking and oxidation.

PYMS

Background and Method

The characterization of the chemical structure of polymeric materials including polypropylene and its additives by PYMS is a well-established analytical technique.^{90,91,92}

⁹⁰ Hanton D.D., Mass Spectrometry of Polymers and Polymer Surfaces *Chemical Review*, 101 (2001) 527-569.

⁹¹ Vourou P., Wronka J., *Polymer Characterization using Mass Spectrometry in Modern Methods of Polymer Characterization*, Eds. Howard G. Barth, Jimmy W. Mays (John Wiley and Sons, Inc. 1991, New York, NY) 495-555.

XI. RECENT TESTIMONY (HOWARD JORDI, PhD)

Deposition/trial testimony:

Diversified Biotech, Inc. vs. GA International, CA Provided service work, consultation, pre-trial preparation and appeared in court in April 2007. To the best of my recollection, we believe that the case was settled on that day. This contention is supported by White and Fudala LC.

Howmedica Osteonics Corp. vs. Zimmer, Inc., Centerpulse Orthopedics, Inc., Smith&Nephew, Inc. Deposed (2006). Case settled, never went to trial based on my records.

Unisource Worldwide, Inc. v. Stone Plastics, Inc., Global Manufacturing Packaging Solutions, LLC Deposed 2008, Testified 2008

Gary Lamoureux, World Wide Medical Technologies, LLC, Advanced Care Pharmacy, Inc., Advanced Care Pharmacy, LLC and Advanced Care Medical, Inc. vs. AnazaoHealth Corporation, F/K/A GENESIS PHARMACY SVC., INC., D/B/A CUSTOM CARE PHARMACY Deposed 2008

United States v Dennis Beetham and DB Western Inc., Testified June 2010

Hoffman Angelie

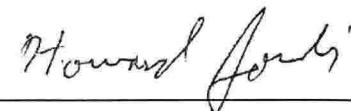
Carolyn Lewis v Ethicon, Testified by Deposition in Oct 2013 and Jan 2014 and Testified at Trial in Feb 2014

Linda Batiste v Ethicon, Testified at Trial in March 2014

XII. COMPENSATION

We are compensated for investigation, study and consultation in the case at the rate of \$350.00 per hour.

This 20th day of May, 2014



Howard Jordi, Ph.D.